

EXHIBIT B

Demetric Di-Az-Confidential

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

REPORTER CERTIFIED
TRANSCRIPT

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON, an individual,

CONFIDENTIAL

Plaintiffs,

vs.

Case No. 3:17-cv-06748-WHO

TESLA, INC. DBA TESLA MOTORS,
INC.; CITISTAFF SOLUTIONS, INC.;
WEST VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.
and DOES 1-10, inclusive,

Defendants.
_____ /

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

DEMETRIC DI-AZ

SAN FRANCISCO, CALIFORNIA

TUESDAY, MAY 15, 2018

Reported By:
Candy Newland
CSR No. 14256
File No. 18-25468



~~Demetric Di-Az-Confidential~~

12:45:38 1 August 24th, 2015; is that right?

12:45:40 2 A. Yes.

12:46:01 3 Q. Did Louis give you any work instructions when
12:46:05 4 you met with him?

12:46:06 5 A. Not that I can recall.

12:46:15 6 Q. Did Louis say anything to you when you first
12:46:18 7 arrived at the Tesla facility?

12:46:20 8 A. He greeted us, "Good morning," and then took us
12:46:24 9 over to the training facility.

12:46:27 10 Q. Did you ever see Louis again during your time on
12:46:31 11 assignment at Tesla?

12:46:33 12 A. No.

12:46:42 13 Q. Did you ever e-mail or otherwise communicate
12:46:44 14 with Louis during the time that you worked at the Tesla
12:46:49 15 facility other than this one occasion?

12:46:52 16 A. No.

12:46:58 17 Q. How were you introduced to the people you would
12:47:01 18 be working with at Tesla?

12:47:02 19 MR. ORGAN: Objection. Vague and ambiguous.

12:47:06 20 THE WITNESS: Can you restate the question?

12:47:06 21 MS. ANTONUCCI:

12:47:08 22 Q. Yeah. At some point you started working in the
12:47:11 23 body in white department; right?

12:47:13 24 A. I worked in the battery production part.

12:47:17 25 Q. Okay. And you worked with the battery team?

12:47:19 1 A. Yes.

12:47:20 2 Q. And who introduced you to the people that you
12:47:23 3 would be working with in the battery team?

12:47:26 4 A. It was more of -- I was put in a group. They
12:47:30 5 said, "This is where you're going." Somebody walked us
12:47:34 6 over there, and then from there we just introduced
12:47:37 7 ourselves.

12:47:37 8 Q. And was the battery team part of body in white?

12:47:40 9 A. I really can't recall.

12:47:42 10 Q. So do you remember who walked you over there?

12:47:46 11 A. No.

12:47:46 12 Q. Do you remember the first person you met once
12:47:49 13 you got there?

12:47:51 14 A. I met the day team supervisor. I don't remember
12:47:54 15 his name.

12:48:11 16 Q. Do you know if his name was Robert Dominguez?

12:48:14 17 A. No, I don't remember.

12:48:30 18 Q. Were you -- did you meet your shift lead on the
12:48:34 19 first day that you started work?

12:48:36 20 A. No. The first day I started we did the training
12:48:40 21 for about a week. So after that I ended up meeting him
12:48:44 22 probably, like, after that.

12:48:45 23 Q. So after you finished your training, did you
12:48:49 24 meet a shift lead?

12:48:49 25 A. I met the supervisor. Then the next day I met

1 I, CANDY NEWLAND, CSR No. 14256, certify that the
2 foregoing proceedings were taken before me at the time
3 and place herein set forth, at which time the witness
4 was duly sworn, and that the transcript is a true record
5 of the testimony so given.

6
7 Witness review, correction, and signature was

8 (X) by Code. (X) requested.

9 () waived. () not requested.

10 () not handled by the deposition officer due to party
11 stipulation.

12
13 The dismantling, unsealing, or unbinding of the
14 original transcript will render the reporter's
15 certificate null and void.

16 I further certify that I am not financially
17 interested in the action, and I am not a relative or
18 employee of any attorney of the parties nor of any of
19 the parties.

20 Dated this 29th day of May, 2018.

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25 CANDY NEWLAND, CSR 14256